

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

**In re:** :  
Nicholle C. Donahue : Case No.: 19-17684  
Debtor(s) : Chapter 13  
: Judge Ashely M. Chan  
\*:\*\*\*\*\*  
**HSBC Bank USA, National Association** : **Related Document # 123**  
**as Trustee for ACE Securities Corp.** :  
**Home Equity Loan Trust, Series 2006-** :  
**CW1, Asset Backed Pass-Through** :  
**Certificates** :  
**Movant,** :  
**vs** :  
:  
**Nicholle C. Donahue**  
**Anthony H. Donahue**  
**Scott F. Waterman, Trustee**  
**Respondents.**

**PRAECIPE OF WITHDRAWAL OF CERTIFICATE OF DEFAULT**  
**(DOCKET NO. 123)**

Now comes HSBC Bank USA, National Association as Trustee for ACE Securities Corp. Home Equity Loan Trust, Series 2006-CW1, Asset Backed Pass-Through Certificates ("Creditor"), by and through its mortgage servicing agent Nationstar Mortgage LLC, by and through counsel, and hereby withdraws its Certificate of Default which was filed in this Court on February 4, 2022. The Certificate of Default needs to be withdrawn because Debtor has submitted funds to cure the arrearage and is now current in payments.

Respectfully submitted,

/s/Stephen R. Franks  
Stephen R. Franks, Esquire (333394)  
Adam B. Hall (323867)  
MDK Legal  
P.O. Box 165028  
Columbus, OH 43216-5028  
Telephone: 614-220-5611

Fax: 614-627-8181  
Attorneys for Creditor  
The case attorney for this file is Stephen R.  
Franks.  
Contact email is [srfranks@mdklegal.com](mailto:srfranks@mdklegal.com)

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Nicholle C. Donahue :  
Anthony H. Donahue :  
Scott F. Waterman, Trustee :  
**Respondents.**

**CERTIFICATE OF SERVICE**

I certify that on the date of filing, a copy of the foregoing Praeclipe of Withdrawal of Certificate of Default (Docket No. 123) was filed electronically. Notice of this filing will be sent to the following parties through the Court's Electronic Case Filing System:

Office of U.S. Trustee, Party of Interest, (Registered address)@usdoj.gov

Scott F. Waterman, Chapter 13 Trustee, ECFMail@ReadingCh13.com

David B. Spitofsky, Attorney for Nicholle C. Donahue, spitofskybk@verizon.net

I certify that on the date of filing, a copy of the foregoing document was sent by U.S. Mail to the following:

Nicholle C. Donahue and Anthony H. Donahue, 12501 Fedor Road, Philadelphia, PA 19154

Philadelphia Gas Works, 800 W. Montgomery Avenue, Philadelphia, PA 19122-2086

Veripro Solutions, Inc., P.O. Box 3572, Coppell, TX 75019

Water Revenue Bureau, 1401 John F. Kennedy Boulevard, Room 580, Philadelphia, PA  
19102

/s/Stephen R. Franks

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